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20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 CHINA CENTRAL TELEVISION, a China
23 company; CHINA INTERNATIONAL
24 COMMUNICATIONS CO., LTD., a China
25 company; TVB HOLDINGS (USA), INC., a
26 California corporation; and DISH
27 NETWORK L.L.C., a Colorado corporation,
28 Plaintiffs,
vs.

CREATE NEW TECHNOLOGY (HK)
LIMITED, a Hong Kong company; HUA
YANG INTERNATIONAL TECHNOLOGY
LIMITED, a Hong Kong company;
SHENZHEN GREATVISION NETWORK
TECHNOLOGY CO. LTD., a China
company; CLUB TVPAD, INC., a California
corporation; BENNETT WONG, an
individual, ASHA MEDIA GROUP INC.
d/b/a TVPAD.COM, a Florida corporation;
AMIT BHALLA, an individual;
NEWTVPAD LTD. COMPANY d/b/a
NEWTVPAD.COM a/k/a TVPAD USA, a
Texas corporation; LIANGZHONG ZHOU,
an individual; HONGHUI CHEN d/b/a E-
DIGITAL, an individual; JOHN DOE 1 d/b/a
BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
JOHN DOE 5 d/b/a GANG YUE; JOHN
DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
d/b/a GANG TAI WU XIA; and JOHN DOES
8-10,

Defendants.

) Case No.
CV 15-1869 SVW (AJWx)
}
STIPULATION FOR ENTRY
OF [PROPOSED] CONSENT
JUDGMENT AND
PERMANENT INJUNCTION
AS TO DEFENDANTS CLUB
TVPAD, INC. AND BENNETT
WONG
}
[Proposed Consent Judgment and
Permanent Injunction concurrently
submitted]
}
Courtroom: 6
Judge: Hon. Stephen V. Wilson
}
Action Filed: March 13, 2015

1 This Stipulation is entered by and between Plaintiffs China Central Television,
2 China International Communications Co., Ltd., TVB Holdings (USA), Inc. and DISH
3 Network L.L.C. (collectively, "Plaintiffs") and Defendants Club TVpad, Inc. and
4 Bennett Wong ("Defendants") through their respective counsel of record, with
5 reference to the following facts:

6 1. Plaintiffs filed the Complaint in this action on March 13, 2015, against,
7 among others, Defendants, with claims including: (1) secondary copyright
8 infringement under the copyright laws of the United States, 17 U.S.C. § 101 *et seq.*;
9 (2) federal trademark infringement and unfair competition under the Lanham Act, 15
10 U.S.C. § 1125(a); (3) common law trademark infringement and unfair competition;
11 and (4) violation of California Business and Professions Code § 17200, *et seq.*

12 2. Plaintiffs and Defendants have agreed to resolve their dispute, and have
13 entered into a Settlement Agreement wherein Defendants have agreed to entry of a
14 consent judgment and permanent injunctive relief in favor of Plaintiffs and in
15 accordance with other terms as set forth in the Settlement Agreement.

16 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**
17 that:

18 1. A true and correct copy of the Consent Judgment and Permanent Injunction
19 agreed to by the parties pursuant to this Stipulation and the parties' Settlement
20 Agreement (the "Consent Judgment") is attached hereto as **Exhibit 1**;

21 2. The parties agree that all facts set forth in the Consent Judgment are true and
22 accurate to their best knowledge and support entry of the Consent Judgment;

23 3. Defendant agrees to be bound by and abide by all permanent injunctive
24 relief set forth in the Consent Judgment entered by the Court;

25 4. The Parties hereby enter into this Stipulation with the advice of counsel
26 knowing its content and effect;

27 5. The Parties request that the Court enter the Consent Judgment in the
28 form attached as **Exhibit 1**; and

6. The Parties request the Court retain jurisdiction to enforce the Consent Judgment, once entered, as required.

So Stipulated.

DATED: March 4, 2016

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LACY H. KOONCE, III (*pro hac vice*)
SAMUEL BAYARD (*pro hac vice*)
GEORGE WUKOSON (*pro hac vice*)

By: _____ /s/Carla A. McCauley
Carla A. McCauley

Attorneys for Plaintiffs
CHINA CENTRAL TELEVISION; CHINA
INTERNATIONAL COMMUNICATIONS
CO., LTD.; TVB HOLDINGS (USA), INC.;
AND DISH NETWORK L.L.C.

DATED: March 4, 2016

RYU LAW FIRM

By: _____ /s/Francis Ryu
Francis Ryu

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CLUB TVPAD, INC. AND BENNETT
WONG